

THE HONORABLE RICARDO MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KENNETH FLEMING and JOHN DOE,

Plaintiffs,

v.

THE CORPORATION OF THE PRESIDENT  
OF THE CHURCH OF JESUS CHRIST OF  
LATTER-DAY SAINTS, a Utah Corporation  
sole, a/k/a the "MORMON CHURCH;" LDS  
SOCIAL SERVICES a/ka LDS FAMILY  
SERVICES, a Utah corporation,

Defendants

NO. C04-2338RSM

DECLARATION OF TIMOTHY D.  
KOSNOFF IN SUPPORT OF  
PLAINTIFFS' RESPONSE TO  
DEFENDANTS' MOTION TO DISMISS

HEARING DATE: January 7, 2005

I, Timothy D. Kosnoff, declare:

1. I am one of the attorneys for the Plaintiffs in this matter. All statements made herein are based on my personal knowledge, and I am competent to testify to the same.

2. Attached as Exhibit A is a true and correct copy of the Complaint filed in this matter.

KOSNOFF DECL. - 1 of 3  
(C04-2338RSM)  
[132881 v6.doc]

LAW OFFICES  
GORDON, THOMAS, HONEYWELL, MALANCA,  
PETERSON & DAHEIM LLP  
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(206) 676-7500 - FACSIMILE (206) 676-7575

1           3.       Attached as Exhibit B is a true and correct copy of the editorial by Gerdes,  
2 Beck, Cowan-Hancock and Winkinson-Sparks, *Adult Survivors of Child Sexual Abuse: The*  
3 *Case of Mormon Women*, 1 JOURNAL OF SOCIAL WORK 1 (Spring 1996).

4           4.       Attached as Exhibit C is a true and correct copy of the editorial by Bob Van  
5 Voris, *Mormons Hit by Child-Sex Lawsuits*, NATIONAL LAW JOURNAL (Nov. 16, 1998).

6           5.       Attached as Exhibit D is a true and correct copy of the editorial by Paul  
7 McKay, *Mormons Caught Up in Wave of Pedophile Accusations/Church Deals with Abuse*  
8 *Cases without Reporting them, Critics Say*, HOUSTON CHRONICLE (May 9, 1999).

9           6.       Attached as Exhibit E is a true and correct copy of the editorial by Lisa Davis,  
10 *Sins of the Temple: The Church of Jesus Christ of Latter Day Saints Emphasized Personal*  
11 *Propriety and the Value of Children. The Same Church Has Protected Serial Child Molesters*  
12 *Across the Country*, PHOENIX TIMES (Dec. 10, 1994).

13           7.       Attached as Exhibit F is a true and correct copy of the editorial by Marion  
14 Smith, *Keeping Mum on Mormon Sexual Abuse*, 15 THE EVENT 23 (Mar. 28, 1996).

15           8.       Attached as Exhibit G is a true and correct copy of excerpts of the Deposition  
16 of Lloyd Hale in *Scott v. Mormon Church*, 9812-08640 (Multnomah County, OR).

17           9.       Attached as Exhibit H is a true and correct copy of the editorial by Daniel H.  
18 Ludlow, *Priesthood and Church Organization, Selections from the Encyclopedia of*  
19 *Mormonism* (1992).

20           10.      Attached as Exhibit I is a true and correct copy of excerpts from the deposition  
21 of Dwayne Liddell in *Scott v. Mormon Church*, 9812-08640 (Multnomah County,  
22 OR).

1 11. Attached as Exhibit J is a true and correct copy of *Child Abuse, Helps for*  
2 *Ecclesiastical Leaders*, The Church of Jesus Christ of Latter-Day Saints (1985).

3 12. Attached as Exhibit K is a true and correct copy of excerpts from *General*  
4 *Handbook of Instructions*, The Church of Jesus Christ of Latter-Day Saints, (1976).

5 13. Attached as Exhibit L is a true and correct copy of the HelpLine Intake Form.

6 14. Attached as Exhibit M is a true and correct copy of the Affidavit of Dwayne  
7 Liddell.

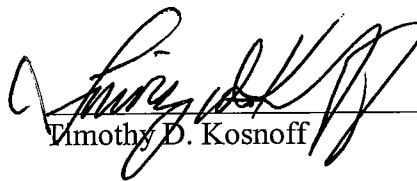
8 15. Attached as Exhibit N is a true and correct copy of excerpts from *The Mormon*  
9 *Corporate Empire*, John Heinerman and Anson Shupe (1985).

10 16. Attached as Exhibit O is a true and correct copy of excerpts from *Mormon*  
11 *America: The Power and the Promise*, Richard Ostling (1999), Appendix B: How the Wealth  
12 and Income Estimates Were Made.

13 I declare under penalty of perjury under the laws of the State of Washington that the  
14 foregoing is true and correct.

15 Dated this 30<sup>th</sup> day of December, 2004, at Seattle, Washington.

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Timothy D. Kosnoff